

LAW OFFICES  
**MADDEN & MADDEN**

MICHAEL P. MADDEN ■  
PATRICK J. MADDEN†  
JOHN-PAUL MADDEN\*  
MATTHEW P. MADDEN\*  
MICHAEL V. MADDEN\*  
TIMOTHY R. BIEG\*  
REGINA M. PHILIPPS\*  
MARK W. STRASLE\*

A PROFESSIONAL CORPORATION  
108 KINGS HIGHWAY EAST, SUITE 200  
P.O. BOX 210  
HADDONFIELD, NEW JERSEY 08033-0389  
TELEPHONE 856-428-9520 | FACSIMILE 856-428-7335  
WWW.MADDENMADDEN.COM

JAMES J. MADDEN  
OF COUNSEL

■ RULE 1:40 QUALIFIED MEDIATOR  
† CERTIFIED BY THE SUPREME COURT  
OF NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
\* MEMBER OF NJ AND PA BAR

December 4, 2017

**VIA ECF**

Clerk, United States District Court, District of New Jersey Camden  
Mitchell H. Cohen U.S. Courthouse, Room 6030  
1 John F. Gerry Plaza, 4th & Cooper Sts.  
Camden, NJ 08101

**RE: DAVIS/WHITE VS. VOORHEES TWP., ET AL  
CASE NO: 1:16-CV-2784**

Dear Judge Hillman:

Please accept this correspondence in lieu of a more formal brief in opposition to the recently filed motion of plaintiffs seeking a stay of defendant, Michael Perez's ("defendant") motion for summary judgment. By way of brief background, defendant filed his motion for summary judgment on September 29, 2017. Thereafter, defendant provided consent for two (2) separate extensions of time to file opposition to defendant's motion.

After plaintiffs most recent request, they filed a motion for reconsideration of this Court's denial of plaintiffs previous motion to amend the Complaint. Plaintiffs now request that defendant's summary judgment motion, in essence, be held in abeyance pending outcome of plaintiff's motion for reconsideration.

Considering that the defendant has already provided plaintiff with two (2) months worth of extensions to file an opposition, and considering the fact that the pending motion for reconsideration has no bearing on the claim against defendant (and therefore does not effect the motion for summary judgment), this Court should deny plaintiffs motion to stay defendants summary judgment motion.

I do appreciate the Court's kind attention to this matter.

Respectfully yours,  
MADDEN & MADDEN, P.A.

*s/Timothy R. Bieg*

Timothy R. Bieg

TRB/md

cc: David Berlin, Esquire (via ECF)  
Dan Long, Esquire (via ECF)  
Joseph M. Nardi, III, Esquire (via email)  
Cheryle Little, Senior Liability Claims Adjuster (via email)  
Officer Michael Perez (via email)

g.: JEN.CJIF.DAVIS.Clerk.ltr re NOM for SJ 12.1.17